

October 18, 2013

California Department of Water Resources
Division of Integrated Regional Water Management
Financial Assistance Branch
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Sacramento, CA 94236
Attn: Ted Daum Theodore.Daum@water.ca.gov

Re: Comments: Appendix H - IRWM Plan Review Process

Greetings:

The Department of Water Resources has not presented a compelling reason why a review process for existing IRWM plans is needed. The Department has had many opportunities to engage with regions and influence the development of their plans. If a review was needed, why wasn't it done during the development phase of the plans or during the recent updating of plans when resources were available to make adjustments to make the plan "meet standards"? This newest proposal for a review process appears to be a waste of resources and time, and does nothing to provide on-the-ground improvements to the state's water infrastructure and environmental quality.

DWR has already had ample opportunity to direct plan development to make sure plans met standards:

1. Region Acceptance Process (RAP) – Many of the elements of an IRWM plan are "approved" by DWR staff during a successful RAP.
2. DWR issuance of Guidelines and Standards – Regions are instructed to follow the Guidelines and Standards produced and publically adopted by DWR.
3. Grant Contract Scope of Work – Most regions obtain funding from DWR in the way of planning grants. The contracts for these grants require performance to the scope of work approved by the Department.
4. Grant Contract Deliverables – DWR planning grants also specify deliverables, including IRWM plans. Regions must meet deliverable requirements or they will not receive reimbursement for contract work.
5. Grant Contract Progress Reports – DWR staff review quarterly progress reports for the contract and can check if processes are on track to meet IRWMP Standards.
6. Stakeholder participation - Most regions consider DWR as a stakeholder to their process and frankly expect DWR participation in stakeholder meetings. They expect DWR to provide input as a stakeholder in meetings and product reviews. I only heard that DWR's Northern Region staff actively participated in stakeholder meetings in their areas; participation by DWR in other regions was minimal.
7. Administrative Draft Plans – Again, most regions consider DWR as a stakeholder to their process and provide copies of their Administrative Draft versions of the plan during plan development to their stakeholder group. DWR would generally have the opportunity of reviewing and making comments on that draft plan.

8. Public Review Draft Plans – As with any agency or the public, DWR staff can participate in reviewing the Public Review Draft IRWMP. In fact, IRWM regions expected their review to keep the plan within standards.
9. Public Meetings –Public meetings are required in order to adopt an IRWMP. DWR can participate and provide comments to the process at those meetings.
10. Final IRWMP Submittal – DWR receives the Final IRWMP. While late to help change the plan to meet standards, DWR staff would have the ability to review the plan, note and deviation from standards and alert the Regional Water Management Group to possible improvements needed in the future.
11. Final Contract Sign-off – Like other DWR grant contracts, a civil engineer is required to sign off the completed grant contract, assuring the standards are met and all elements of the contract successfully completed.

With all these opportunities to guide the development of IRWMPs in the state, why is another subjective review of IRWM plans necessary? Hopefully, it is not just to change some words on plans that then will sit on shelves.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read "William J. Bennett".

William J. Bennett, PE

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